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6 Attorneys for Defendants  
 7 JOHN BARGETTO and  
 BARGETTO'S SANTA CRUZ WINERY

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

12 MARILYN CHURCHILL, an individual,

13 Plaintiff,

14 v.

15 JOHN BARGETTO, in his individual and  
 16 official capacities; BARGETTO'S SANTA  
 CRUZ WINERY, a California Corporation;  
 and DOES 1 through 100, inclusive,

17 Defendants.

CASE NO. C07-03007 MMC

**STIPULATION TO CONTINUE  
 DISCOVERY DEADLINES**

**Honorable Maxine M. Chesney**

19 Counsel for Plaintiff MARILYN CHURCHILL and Defendants JOHN BARGETTO and  
 20 BARGETTO'S SANTA CRUZ WINERY (hereinafter collectively referred to as the "Parties")  
 21 hereby STIPULATE as follows:

- 22 1. There is currently pending discovery that must be completed prior to a meaningful  
 mediation;
- 24 2. Due to various reasons including, but not limited to, the change of law firms  
 representing defendants, and the passing of the father of plaintiff's counsel, the discovery has not  
 been completed;
- 27 3. The current deadlines for discovery will not allow for the completion of the  
 necessary discovery;

4. Counsel agree that the following deadlines are continued thirty days:

- a. Non-expert discovery cut-off from March 28, 2008 to April 28, 2008;
- b. Designation of experts from April 18, 2008 to May 18, 2008;
- c. Designation of rebuttal experts from May 2, 2008 to June 2, 2008;
- d. Expert discovery cut-off from May 23, 2008 to June 23, 2008;
- e. Dispositive motion cut-off from June 6, 2008 to July 6, 2008.

## IT IS SO STIPULATED.

Dated: February 29, 2008

THE MORALES LAW FIRM

By: /s/ David Morales  
**DAVID MORALES**  
Attorneys for Plaintiff

Dated: February 29, 2008

TINGLEY PIONTKOWSKI LLP

/s/ Bruce C. Piontkowski  
BRUCE C. PIONTKOWSKI  
Attorneys for Defendants

GOOD CAUSE APPEARING, it is hereby ordered that the above-identified deadlines for discovery are hereby continued 30 days.

IT IS SO ORDERED.

Dated: February , 2008

Honorable Maxine M. Chesney  
JUDGE OF THE U.S. DISTRICT COURT

1 I hereby attest that I have on file all holograph signatures for any signatures indicated by a  
2 "conformed" signature (/s/) within this efiled document.

3 Dated: February 29, 2008

TINGLEY PIONTKOWSKI LLP

4 By:s/ Bruce C. Piontkowski  
5 BRUCE C. PIONTKOWSKI  
6 Attorneys for Defendants

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